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July 10, 2024

Via ECF and Email Hon. Vincent L. Briccetti United States Courthouse Southern District of New York 300 Quarropas St. White Plains, NY 10601-4150 APPLICATION GRANTED
SO ORDERED:
Vincent I. Belowat V. Grantel

Vincent L. Briccetti, U.S.D.J. Dated: 7/11/24

White Plains, NY

USDC SDNY DOCUMENT

DOC#:

**ELECTRONICALLY FILED** 

DATE FILED: \_7-11-24

Re: USA v. Teresa Santini 23 CR 468 (VB)

REQUEST MODIFICATION BOND CONDITIONS FOR TRAVEL

## Your Honor:

My client, Teresa Santini, requests modification of ¶7(f) of Additional Conditions of Release (ECF 43 page 4 of 7) to permit her to travel from the Middle District of Pennsylvania (district of residence) to the Eastern District of Pennsylvania (location of Lehigh Valley Airport) and then to fly from LVA to the District of South Carolina (trip destination). If this application is granted, Santini would fly from Pennsylvania to South Carolina on August 7, 2024 and fly back from South Carolina to Pennsylvania on August 11, 2024.

I have conferred by email with U.S. Probation Officer J.J. Dempsey. Probation has no objection to this request. I have also conferred by email with AUSA Kaiya Arroyo. The Government takes no position on this request. Probation Officer Dempsey has Santini's flight information and the location where she would stay in South Carolina.

Accordingly, Santini requests that her bond conditions be modified to add the Eastern District of Pennsylvania, the District of South Carolina and all points in between for travel during the period from August 7, 2024 through August 11, 2024. Granting this application would permit Santini to participate in a family reunion.

Respectfully submitted,

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Daniel A. Hochheiser

Cc: all counsel via ECF